IN THE UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF TENNESSEE

IN RE:

JPR ENTERTAINMENT, LLC.	CASE NO. 10-01634-KL3-7
	CHAPTER 7
Debtor,	JUDGE KEITH M. LUNDIN

MICHAEL GIGANDET, TRUSTEE,

Plaintiff

vs. ADV NO. 310-0674A

JOSH CARDIN,

Defendant.

ANSWER TO COMPLAINT FOR JUDGMENT

Comes now the Defendant, Josh Cardin, and answers the allegations contained in the Complaint for Judgment alleged by Michael Gigandet as Trustee in Bankruptcy for JPR Enterprises.

1. Paragraph 1 is admitted.
2. Paragraph 2 is admitted.
3. Paragraph 3 is admitted.
4. Paragraph 4 is denied in that Josh Cardin is a citizen and resident of Davidson County, and resides at 1613 Doubletree Lane, Nashville, TN 37217.
5. It is denied that the Defendant owes $2,000 or any other amount to the Debtors.
6. The Defendant denies having filed an unsupported proof of claim in the bankruptcy case claiming to be entitled to $33,000 in that the Defendant was a partial owner of JPR Enterprises and Ralph and Patricia Doney relieved the Defendant as genral manager of Club Emporium which was the main property of JRP Enterprises without holding a board meeting or a meeting of shareholders and without providing notice to Mr. Cardin. The removal by the Debtors of Mr. Cardin from Club Emporium was done fraudulently and maliciously in order to make a financial gain to Mr. Cardin's detriment.

The Defendant submits his proof of claim was proper though the sum was alleged based upon his perceived value of the corporation at that time and wages due and owing that were never paid by JRP Enterprises to the Defendant. Thus the Defendant submits the proof of claim was not fraudulent and the Defendant submits he should be entitled to proceed on his claim.

WHEREFORE, PRESMISES CONSIDERED, the Defendant prays having fully answered this complaint as follows:

1. All the relief sought by the Trustee ought to be denied;
2. That the Defendant does not owe the Plaintiff $2,000 or any other amount to be proven at trial;
3. The objection to the proof of claim should likewise be denied.
4. For such other, further and general relief as may be just.

Respectfully submitted,

/s/ JOHN D. DRAKE
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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the foregoing pleading has been delivered to Michael Gigandet, Trustee, 208 Centre Street, Pleasant View, TN 37146, US Trustee, 701 Broadway, Customs House, Nashville, TN 37203, and Samuel Crocker, Attorney for Debtors, 611 Commerce Street, Ste. 2720, Nashville, TN 37203, via US Mail, postage prepaid, this the 24th day of February, 2011.

/s/ JOHN D. DRAKE